

DIRECT - HANSEN (Gould)

Page 5	Page 7
<p>1 JON HANSEN</p> <p>2 Of lawful age, being first</p> <p>3 duly cautioned and solemnly</p> <p>4 sworn as hereinafter certified,</p> <p>5 was examined and testified as</p> <p>6 follows:</p> <p>7 DIRECT EXAMINATION</p> <p>8 BY MR. GOULD:</p> <p>9 Q Can you please state and spell your full</p> <p>10 name for the record?</p> <p>11 A Jon Paul Hansen.</p> <p>12 Q Have you ever given a deposition before?</p> <p>13 A No, sir.</p> <p>14 Q Before we start, I'm going to go over the</p> <p>15 rules of the deposition so we're all on the same</p> <p>16 page here. I'm going to be asking you a number of</p> <p>17 questions. If you do not understand my question,</p> <p>18 you need to tell me. Otherwise, I'm going to assume</p> <p>19 that you understood the question and you answered</p> <p>20 truthfully and to the best of your ability, sound</p> <p>21 fair?</p> <p>22 A Yes, sir.</p> <p>23 Q Throughout the deposition, we may be --</p> <p>24 become conversational. I need you to give verbal</p> <p>25 responses, yes, no answers. No huh-uhs, uh-huhs.</p> <p>That's for the court reporter's sake so the record</p> <p>is clear, okay?</p>	<p>1 Chadron State College?</p> <p>2 A In this capacity, I have been employed by</p> <p>3 Chadron State College since February of 2013. I</p> <p>4 believe it's February 18.</p> <p>5 Q In preparation for this deposition, did</p> <p>6 you review any documents?</p> <p>7 A Yes.</p> <p>8 Q What documents?</p> <p>9 MR. JOHNSON: We'll give you copies. Do</p> <p>10 you have those copies?</p> <p>11 MS. BROWN: I have four copies of each of</p> <p>12 them, Marty, so --</p> <p>13 MR. GOULD: Okay.</p> <p>14 MS. BROWN: -- if you want to enter them</p> <p>15 in and then --</p> <p>16 MR. GOULD: We'll mark these.</p> <p>17 MR. JOHNSON: Why don't you go ahead and</p> <p>18 give him two copies of each so he can mark one as an</p> <p>19 exhibit.</p> <p>20 MS. BROWN: There you go.</p> <p>21 MR. JOHNSON: Okay.</p> <p>22 MS. BROWN: And then I'll start another</p> <p>23 stack.</p> <p>24 MR. GOULD: All right. So I'm going to</p> <p>25 mark this Chadron State College, Sexual Assault,</p>
Page 6	Page 8
<p>1 A Yes, sir.</p> <p>2 Q Can we agree on that?</p> <p>3 A Yes, sir.</p> <p>4 Q Let me finish asking my question before</p> <p>5 you answer, and I'll wait for you to answer before I</p> <p>6 ask my next question, okay?</p> <p>7 A Yes, sir.</p> <p>8 Q Bathroom breaks, you can take them. The</p> <p>9 only rule is that if I have a question pending, you</p> <p>10 have to answer the question first before you take a</p> <p>11 break. Can we agree on that?</p> <p>12 A Yes.</p> <p>13 Q Can you -- can you please state and spell</p> <p>14 your last name for the record?</p> <p>15 A Hansen. H-a-n-s-e-n.</p> <p>16 Q How old are you, sir?</p> <p>17 A Forty-nine.</p> <p>18 Q Are you currently employed?</p> <p>19 A Yes.</p> <p>20 Q Where do you work?</p> <p>21 A Chadron State College.</p> <p>22 Q And what's your job title?</p> <p>23 A Vice President for Enrollment Management,</p> <p>24 Marketing, and Student Services.</p> <p>25 Q And how long have you been employed by</p>	<p>1 Sexual Harassment, and Domestic/Relationship</p> <p>2 Violence PowerPoint as Hansen Exhibit 1.</p> <p>3 (Hansen Exhibit Number 1 was marked for</p> <p>4 identification.)</p> <p>5 MR. GOULD: I'm going to mark Policy 3020</p> <p>6 as Hansen Exhibit 2.</p> <p>7 (Hansen Exhibit Number 2 was marked for</p> <p>8 identification.)</p> <p>9 MR. GOULD: I'm going to mark an email</p> <p>10 from Shelley Dunbar to Jon Hansen, Joel Smith,</p> <p>11 cc'ing Kristin Petersen on November 7, 2014, as</p> <p>12 Hansen Exhibit 3.</p> <p>13 (Hansen Exhibit Number 3 was marked for</p> <p>14 identification.)</p> <p>15 MR. GOULD: I'm going to mark the</p> <p>16 Title IX "Designee" Training for CSC as Hansen</p> <p>17 Exhibit 4.</p> <p>18 (Hansen Exhibit Number 4 was marked for</p> <p>19 identification.)</p> <p>20 BY MR. GOULD:</p> <p>21 Q Mr. Hansen, can you tell me, what is this</p> <p>22 document here?</p> <p>23 A Those -- this first page is notes that</p> <p>24 Dr. Rhine gave me from when we met with</p> <p>25 Mr. Larios and -- Mr. Larios, Nelson and Elmer, just</p>

2 (Pages 5 to 8)

DIRECT - HANSEN (Gould)

<p style="text-align: right;">Page 125</p> <p>1 MR. JOHNSON: Object to the form of the</p> <p>2 question.</p> <p>3 A I -- I don't know.</p> <p>4 Q Okay. Well, in terms of Chadron State</p> <p>5 College, you believe they -- they couldn't have done</p> <p>6 anything else about it; is that right?</p> <p>7 MR. JOHNSON: Object, form of the</p> <p>8 question, asked and answered.</p> <p>9 A I don't know that there's anything that we</p> <p>10 could have done that would have -- would have</p> <p>11 changed this situation. We could have made it</p> <p>12 better. We could have made it worse. It could have</p> <p>13 been the same. I don't know.</p> <p>14 MR. GOULD: No further questions.</p> <p>15 MR. JOHNSON: We'll read and sign. We'll</p> <p>16 start the next deposition at 2 o'clock.</p> <p>17 (The deposition was concluded at</p> <p>18 12:54 p.m.)</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 127</p> <p>1 CERTIFICATE</p> <p>2 STATE OF NEBRASKA)</p> <p>3) ss.</p> <p>4 COUNTY OF DOUGLAS)</p> <p>5 I, Rachel McMenamin, General Notary Public</p> <p>6 in and for the State of Nebraska, do hereby certify</p> <p>7 that JON HANSEN was by me duly sworn to testify the</p> <p>8 truth, the whole truth and nothing but the truth, and</p> <p>9 that the deposition by him as above set forth was</p> <p>10 reduced to writing by me.</p> <p>11 That the within and foregoing deposition</p> <p>12 was taken by me at the time and place herein</p> <p>13 specified and in accordance with the within</p> <p>14 stipulations, the reading and signing of the witness</p> <p>15 to his deposition having not been waived.</p> <p>16 That I am not counsel, attorney or relative</p> <p>17 of either party or otherwise interested in the event</p> <p>18 of this suit.</p> <p>19 IN TESTIMONY WHEREOF, I have placed my hand</p> <p>20 and notarial seal this 11th day of April, 2018.</p> <p>21 -----</p> <p>22 GENERAL NOTARY PUBLIC</p> <p>23 COST: \$ _____</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 126</p> <p>1 J U R A T</p> <p>2</p> <p>3 I, JON HANSEN, do hereby state under oath</p> <p>4 that I have read the above and foregoing deposition</p> <p>5 in its entirety and that the same is a full, true,</p> <p>6 and correct transcription, with my noted corrections,</p> <p>7 if any, of my testimony so given at said time and</p> <p>8 place.</p> <p>9</p> <p>10</p> <p>11 _____</p> <p>12 (Deponent's Signature)</p> <p>13</p> <p>14 _____</p> <p>15 (Date)</p> <p>16</p> <p>17 STATE OF NEBRASKA)</p> <p>18) ss.</p> <p>19 COUNTY OF DOUGLAS)</p> <p>20</p> <p>21 Subscribed and sworn to before me on this</p> <p>22 ____ day of _____, 2018.</p> <p>23</p> <p>24 _____</p> <p>25 GENERAL NOTARY PUBLIC</p>	<p style="text-align: right;">Page 128</p> <p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 DISTRICT OF NEBRASKA</p> <p>3 LISSETTE LARIOS ROOHBAKHSH, as)</p> <p>4 personal representative of the)</p> <p>5 ESTATE OF FATIMA LISSETTE LARIOS)</p> <p>6 and on behalf of next of kin,) Case No.</p> <p>7 and) 8:17-cv-00031-</p> <p>8 NELSON LARIOS, as next of kin) JFB-CRZ</p> <p>9 Plaintiffs,)</p> <p>10 v.)</p> <p>11 BOARD OF TRUSTEES OF THE NEBRASKA)</p> <p>12 STATE COLLEGES)</p> <p>13 and) CERTIFICATE</p> <p>14 CHADRON STATE COLLEGE,) OF REPORTER</p> <p>15 Defendants.)</p> <p>16 _____)</p> <p>17</p> <p>18 I, Rachel McMenamin, General Notary Public,</p> <p>19 do hereby certify that I served as the Court Reporter</p> <p>20 at the deposition of JON HANSEN on April 4, 2018, at</p> <p>21 1500 Woodmen Tower, 1700 Farnam Street, Omaha,</p> <p>22 Nebraska, in which the costs of reporting and</p> <p>23 transcribing the deposition were \$ _____, and that</p> <p>24 such costs are to be paid by counsel for the</p> <p>25 plaintiffs.</p> <p>I further certify that the original and</p> <p>copies were sent to: Original and 1 copy to</p> <p>Mr. Martin D. Gould; 1 copy to Mr. Thomas Johnson.</p> <p>Dated this 11th day of April, 2018.</p> <p>Delivered: _____</p> <p>GENERAL NOTARY PUBLIC</p> <p>Rachel McMenamin</p> <p>Thibault, Suhr & Thibault, Inc.</p> <p>6818 Grover Street</p> <p>Omaha, NE 68127</p> <p>(402) 331-2500</p>

32 (Pages 125 to 128)

Page 129

1 April 11, 2018
 2 Mr. Thomas Johnson
 Attn: JON HANSEN
 3 1500 Woodmen Tower
 1700 Farnam Street
 4 Omaha, NE 68102
 5 Dear Mr. Hansen:
 6 You will recall on April 4, 2018, I took your
 deposition at 1500 Woodmen Tower, 1700 Farnam Street,
 7 Omaha, Nebraska dealing with the case of LISSETTE
 LARIOS ROOHBAKHSH, as personal representative of the
 8 ESTATE OF FATIMA LISSETTE LARIOS and on behalf of
 next of kin, Plaintiffs v. Board of Trustees of the
 9 Nebraska State Colleges and Chadron State College,
 Defendants. Your signature on the deposition was not
 10 waived.
 11 The manuscript of the transcript, which is an exact
 duplicate of the original, is ready for your review.
 12 I would appreciate it if you would read it, then sign
 the errata sheet and jurat page and return back to me
 13 in the enclosed envelope as soon as possible. You
 may keep the manuscript. Local practice allows a
 14 witness 30 days in which to read and sign the
 original and return same to the reporter.
 15
 16 As you read the manuscript, please note any
 corrections you might have on the correction sheet
 enclosed with the manuscript giving the page number,
 17 line number, and the reason for the correction to be
 made as so indicated on the sheet.
 18
 19 After reading and noting any corrections on the
 sheet, please sign the jurat page and also the
 20 correction page. Please sign both pages in front of
 a Notary Public and then have the Notary sign on the
 proper line.
 21
 22 Thank you for your cooperation in this matter.
 23
 24 Yours truly,
 Rachel McMenamin
 25 cc: Mr. Martin D. Gould
 Mr. Thomas Johnson

Page 130

1 DEPOSITION CORRECTIONS OF JON HANSEN
 2 CASE: LARIOS v. BOARD OF TRUSTEES OF THE NEBRASKA
 STATE COLLEGES, ET AL.
 3 Case No. 8:17-cv-00031-JFB-CRZ
 4 PAGE LINE REASON FOR
 NO. NO. CORRECTION CORRECTION
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 19 _____
 SIGNATURE OF WITNESS
 20 STATE OF NEBRASKA)
) ss
 21 COUNTY OF DOUGLAS)
 22 Subscribed and sworn to before me this
 ____ day of _____, 2017.
 23
 24 _____
 GENERAL NOTARY PUBLIC
 25

33 (Pages 129 to 130)

THIBAULT, SUHR & THIBAULT, INC.
 Omaha, Nebraska (402) 331-2500

J U R A T

I, JON HANSEN, do hereby state under oath
 that I have read the above and foregoing deposition
 in its entirety and that the same is a full, true,
 and correct transcription, with my noted corrections,
 if any, of my testimony so given at said time and
 place.



 (Deponent's Signature)

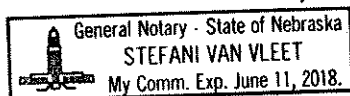
05/09/18
 (Date)

STATE OF NEBRASKA)
) ss.
 COUNTY OF DOUGLAS)

Dawes

Subscribed and sworn to before me on this
9th day of May, 2018.


 GENERAL NOTARY PUBLIC



1 DEPOSITION CORRECTIONS OF JON HANSEN

2 CASE: LARIOS v. BOARD OF TRUSTEES OF THE NEBRASKA
STATE COLLEGES, ET AL.

3 Case No. 8:17-cv-00031-JFB-CRZ

4 PAGE LINE REASON FOR
NO. NO. CORRECTION CORRECTION

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20 STATE OF NEBRASKA)

) ss

21 COUNTY OF DOUGLAS) Dawes

22 9th Subscribed and sworn to before me this
23 day of May, 2018.24
25
General Notary - State of Nebraska
STEFANI VAN VLEET
My Comm. Exp. June 11, 2018. GENERAL NOTARY PUBLIC